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12 *Attorneys for Defendant*
13 *Cox Communications*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 KARLA GORMAN,

17 Plaintiff,

18 vs.

19 EXPERIAN INFORMATION SOLUTIONS,
20 INC.; NATIONAL CONSUMER TELECOM
21 & UTILITIES EXCHANGE, INC., COX
22 COMMUNICATIONS; KOHL'S INC.

23 Defendants.

24 Case No. 2:22-CV-00369-JCM-BNW

25 **STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME FOR COX
COMMUNICATIONS TO RESPOND TO
PLAINTIFF'S COMPLAINT FOR
DAMAGES UNDER FCRA, 15 U.S.C. § 1681
[FIRST REQUEST]**

26 Defendant Cox Communications (“Cox”), by and through its attorneys, Dickinson Wright
27 PLLC, and Plaintiff Karla Gorman (“Plaintiff”), by and through her attorneys, Freedom Law Firm
28 and Kind Law, stipulate and agree as follows:

- 29 1. Plaintiff filed her Complaint for Damages under FCRA, 15 U.S.C. § 1681 on March
30 February 28, 2022 (the “Complaint”).
31 2. Plaintiff served Cox on March 2, 2022.
32 3. Cox’s deadline to respond, move or otherwise pleads to the Complaint is March 23,
33 2022.

1 4. Plaintiff and Defendant have agreed that Cox shall have up to an including April
2 29, 2022, to respond, move or otherwise pleads to the Complaint.

3 5. The request for an extension is so that Cox can review its records pertaining to the
4 allegations in the Complaint.

5 6. This is the first stipulation between Plaintiff and Cox to extend the time for Cox to
6 respond, move or otherwise plead to the Complaint and it is not being entered into for purposes of
7 any delay.

8 Dated: March 21st, 2022.

Dated: March 21st, 2022.

9 **DICKINSON WRIGHT PLLC**

FREEDOM LAW FIRM

11 */s/: Michael N. Feder* _____
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22 *Attorneys for Defendant*
23 *Cox Communications*

24 */s/: Gerardo Avalos* _____
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42 Email: mk@kindlaw.com

43 *Attorneys for Plaintiff Karla Gorman*

44 **ORDER**

45 **IT IS SO ORDERED.**

46 DATED: March 22, 2022


47 _____
48 UNITED STATES MAGISTRATE JUDGE

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2 **CERTIFICATE OF SERVICE**
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4 The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on
5 the 21st of March, 2022, she caused a copy of **STIPULATION AND [PROPOSED]**
6 **ORDER EXTENDING TIME FOR COX COMMUNICATIONS TO RESPOND TO**
7 **PLAINTIFF'S COMPLAINT FOR DAMAGES UNDER FCRA, 15 U.S.C. § 1681[FIRST**
8 **REQUEST]** to be served electronically to all parties of interest through the Court's *CM/ECF*
system as follows:

9 Michael Kind
10 **KIND LAW**
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Las Vegas, NV 89123

12 George Haines
13 Gerard Avalos
14 **FREEDOM LAW GROUP**
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16
17 *Attorneys for Plaintiff Karla Gorman*
18

19
20 _____
21 /s/: *Dianne Kelling*
22 An Employee of Dickinson Wright PLLC
23
24
25
26
27
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